

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

LHF PRODUCTIONS, INC.,

Plaintiff,

v.

MOHAMMED KHAN, an individual,

Defendant/Counterclaimant,

FAISAL RAZA, an individual,

Defendant.

Civil Action No. C17-782 RSM

STIPULATED CONSENT JUDGMENT

As attested to by the signatures below, this matter comes before the Court on the parties' joint stipulation. Plaintiff filed this action against various Doe Defendants in the United States District Court for the Western District of Washington for copyright infringement, 17 U.S.C. §§ 101, et seq. (Dkt. 10), resulting from the illegal copying and distribution of Plaintiff's motion picture entitled *London Has Fallen* ("Motion Picture"), registered with the United States Copyright Office, Reg. No. PA 1-982-831.

Defendant Mohammed Khan was subsequently identified and joined in the case as Doe 3, the subscriber associated with Internet Protocol address 98.246.65.97 on 2017-04-24 14:48:13 UTC. Defendant Khan denied responsibility and has a counterclaim against Plaintiff for a declaratory judgment action of noninfringement.

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1 Defendant Khan has identified his roommate, Faisal Raza, as the responsible party.

2 Plaintiff asserts they have a valid and enforceable rights in the original copyrighted work *London*
3 *Has Fallen*, registered with the United States Copyright Office, Reg. No. PA 1-982-831.

4 The parties, after conferral and investigation, now appear to fully and finally resolve claims
5 between the parties and the matters before the Court pursuant to a Confidential Settlement
6 Agreement and move for entry of this Stipulated Consent Judgment to effect the terms of their
7 settlement.

8 WHEREFORE IT IS HEREBY STIPULATED AND ORDERED for all matters relevant to this
9 case between the parties, as follows:

10 1. This Court has jurisdiction over the parties and venue is proper.

11 2. Defendant Raza stipulates to the below relief, each a material element in settlement
12 of this action.

13 3. On the terms set forth, Plaintiff stipulates to dismissal of its claims against
14 Defendants Khan and Raza with prejudice, and Counterclaimant Khan stipulates to dismissal of
15 his claims against Plaintiff with prejudice, with each side bearing its own fees and costs.

16 4. Pursuant to 17 U.S.C. §502, Defendant Faisal Raza is permanently enjoined from
17 directly or indirectly infringing Plaintiff's rights in *London Has Fallen*, whether now in existence
18 or later created, that is owned or controlled by Plaintiff, including without limitation by using the
19 Internet to reproduce or copy, distribute or otherwise make available for distribution to the public
20 Plaintiff's motion pictures, except pursuant to a lawful license or with the express authority of
21 Plaintiff.

22 5. Pursuant to 17 U.S.C. § 503, Defendant Raza is ordered to destroy all copies of
23 *London Has Fallen* that Defendant Raza may have downloaded onto any computer hard drive or
24 server without Plaintiff's authorization and shall destroy all copies of *London Has Fallen*, those
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1 motion pictures transferred onto any physical medium or device in each Defendant Raza's
2 possession, custody, or control.

3 6. Defendant Raza shall serve on Plaintiff, within 30 days of service of this order, a
4 report in writing under oath setting forth in detail the manner and form in which Defendant Raza
5 has complied with the terms of the ordered relief.

6 With entry of this Stipulated Consent Judgment this matter is terminated.

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8 SO ORDERED this 27th day of October 2017.

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11 RICARDO S. MARTINEZ
12 CHIEF UNITED STATES DISTRICT JUDGE
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17 SO STIPULATED AND RESPECTFULLY SUBMITTED October 27, 2017.

18 s/ David A. Lowe, WSBA No. 24,453

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Khan and Defendant Raza*